

1 MICHAEL C. ORMSBY  
United States Attorney  
2 Eastern District of Washington  
JAMES A. GOEKE  
3 Assistant United States Attorney  
402 E. Yakima Avenue, Suite 210  
4 Yakima, WA 98901  
(509) 454-4425

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

NOV 16 2011

JAMES R. LARSEN, CLERK  
DEPUTY  
SPokane, Washington

6 UNITED STATES DISTRICT COURT  
7 EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA, )

10 Plaintiff, )

11 vs. )

12 STEPHEN MARTY WARD, )

13 Defendant. )

**CR-11-2123-RMP**

**INDICTMENT**

Vio: 18 U.S.C. § 1832(a)(2)  
Theft of Trade Secrets

16  
17 The Grand Jury charges:

18 Beginning on or about August 8, 2011 and continuing to on or  
19 about November 10, 2011, in the Eastern District of Washington,  
20 the defendant, STEPHEN MARTY WARD, with the intent to convert  
21 trade secrets that are related to and included in a product that  
22 is produced for and placed in interstate and foreign commerce,  
23 specifically information related to the maintenance and operation  
24 of unmanned aircraft systems developed by Insitu Incorporated, to  
25 the economic benefit of a person other than the trade secret's  
26 owner, and knowing that the offense will injure any owner of that  
27 trade secret, knowingly did without authorization copy,

28  
INDICTMENT

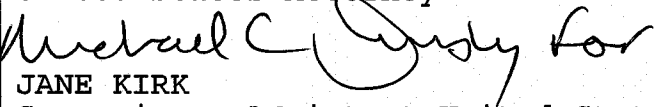
1 duplicate, download, replicate, and transmit such trade secrets  
2 without authorization, all in violation of 18 U.S.C. § 1832(a)(2).

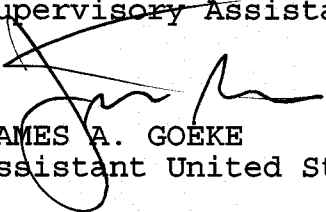
3 DATED: November 16, 2011

4 15 A TRUE BILL

5  
6  Foreperson  
7

8 MICHAEL C. ORMSBY  
9 United States Attorney

10  JANE KIRK  
11 Supervisory Assistant United States Attorney

12  JAMES A. GOEKE  
13 Assistant United States Attorney  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28